

# EXHIBIT TT

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF JOHNNY TORRES**

I, Johnny Torres, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Affidavit are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I was a floor supervisor for office services with Oppenheimer Funds. My job required that I maintain supplies and inventory, and set up catering & audio/visual conferences for executives on approximately seven floors inside Oppenheimer's offices within Two World Trade Center (2 WTC).

4. I arrived at work on the morning of 9/11 at around 8:15. While I was in the kitchen on the 37<sup>th</sup> floor, I heard a loud explosion and the building trembled (which I later learned was the first passenger plane that had plunged into One World Trade Center (1 WTC). I ran to the windows and saw building debris falling and my initial thought was that a bomb had possibly exploded on the floors above me. My coworkers recommended that I move away from the

windows. At that point, my coworkers all were leaving the building and ran to the stairs to get to the lobby of 2 WTC. In fear and panic, I decided to get in the elevator to escape the attacks.

5. I rode the elevator down to the concierge level, which was below the street level, since the elevator did not stop on street level as I had intended. When I emerged from the elevators, I encountered complete chaos. There were people screaming and running in all directions. I ran to the escalators which led me back up to street level. As I emerged onto the street level, it was complete chaos from people screaming, crying, and running in all directions. I had to avoid building debris and broken glass that were falling from above. The scene looked like a war zone. As building debris, dust, smoke, and body parts surrounded me, I watched as people jumped to their deaths from 1 WTC. While in the thick and dark debris field, I inhaled massive quantities of dust, chemicals, building debris, and other harmful inhalants. The sounds of people screaming in agony and crying with despair were deafening, and these sounds haunt me to this very day.

6. In complete panic and fear, I ran to Five World Trade Center (5 WTC) to try and locate my close friend, Vincent Ferranti, who worked in that building for Morgan Stanley. Once I reached the area of 5 WTC, I stood in shock and absolute horror and I began to uncontrollably cry as I continued to watch the smoke and debris billowing from the 1 WTC. I saw people hanging out of the windows of that building and jumping to their deaths. I began to feel a tight pain in my chest at that point and my heart beat became very rapid. I was in a total state of shock, fear, and panic.

7. My friend Vincent suddenly came up behind me and began to shake me. He said that I was fixated on 1 WTC and that I would not look away. At that point, I heard a second loud

explosion and I watched in horror as the upper section of 2 WTC exploded into a ball of flames as a second passenger jet slammed into that building.

8. Vincent and I immediately began to run away from the area of the World Trade Center buildings and we ran a few blocks away to safety. I stopped just long enough to try and call family members from a store, but phones did not work. We heard that all trains, busses, and transportation in and out of Manhattan were not operating. We then decided to run towards Brooklyn. We frantically ran away in panic and fear for several miles and ended up at the base of the Williamsburg Bridge in order to escape these horrible terrorist attacks. I heard and saw loud jets flying overhead and this added to my confusion, fear, panic, and terror. All of a sudden, I then heard an incredibly loud rumble and I heard people screaming and shouting, "The building is falling!!" I watched in shock and horror as 2 WTC collapsed in a cloud of dust and fire. I then sat on the ground crying uncontrollably with Vincent and in shock as smoke and dust filled the air around me.

9. We decided to run across the bridge, and as we started to go, I then heard another loud rumble and I watched in agony and horror as 1 WTC also collapsed. At that point, I began to experience a full panic attack and I began to run across the Williamsburg Bridge towards Brooklyn to try to get safely home to Queens. In the days and weeks following these horrific events, I began to experience periodic chest pain on the left side, as well as feelings of being scared, panicked, and afraid, and I would jump at the slightest sound. Further, within a week or two of these events, I began to experience lower back pain, buttock pain, hip pain, and left leg pain that I attribute to my experience and escape following the 9/11 attacks.

10. As a result of these horrific terrorist attacks, I suffered and continue to suffer from the following physical conditions: significant respiratory issues, including reactive airway

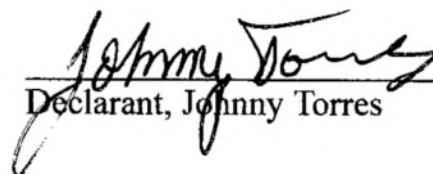
dysfunction syndrome, sleep apnea, GERD, and recurrent pneumonia; autoimmune diseases which have been attributed to my inhaling and being exposed to dust and debris in the air on 9/11, including Hashimoto's disease, Celiac disease, chronic neuropathy/restless leg syndrome, Fibromyalgia, Epstein Barr, and Psoriasis/Psoriatic Arthritis, transient but sharp chest pain on the left side, posterior lumbar pain, buttock pain, burning hip pain, numbness of my feet, and left leg pain, which radiates down the front, side, and back of my left leg. The above pain in my back, buttocks, and left leg are exacerbated when I walk or stand too long.

11. Further, as a result of these traumatic events that I experienced on 9/11, I suffered and continue to suffer from PTSD, severe anxiety, and bouts of manic depression. These emotional conditions are triggered on an almost daily basis by certain smells, sounds, nightly dreams and views. I have been specifically diagnosed with a major depressive disorder with recurrence, post-traumatic stress disorder, an anxiety disorder, and a panic disorder. I even attempted suicide as a result of my illness. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day. I have been deemed totally psychiatrically disabled due to my experiences on 9/11 as described above.

12. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following these September 11, 2001 terrorist attacks.

I DECLARE, VERIFY, AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 2nd day of February 2021.

  
Declarant, Johnny Torres

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**